

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

---

|   |   |                                       |
|---|---|---------------------------------------|
| MPROSIEMO LIMITED,                          | : |                                       |
|   | : | No. 17-CV-3745                        |
| Plaintiff,                                  | : |                                       |
| -against-                                   | : |                                       |
| ARKADIY VAYGENSBERG,                        | : | <b><u>NOTICE OF VOLUNTARY</u></b>     |
| LEONID TATARCHUK,                           | : | <b><u>DISMISSAL PURSUANT TO</u></b>   |
| STEFAN STEFANOV,                            | : | <b><u>F.R.C.P. 41(a)(1)(A)(i)</u></b> |
| ARKENSBERG, LLC,                            | : |                                       |
| NIS, INC.,                                  | : |                                       |
| ROMANIROV, LLC,                             | : |                                       |
| ELMWOOD VENTURES, LLC,                      | : |                                       |
| NICHOLAS BARTHELEMY,                        | : |                                       |
| GEORGE V. EATERTAINMENT, S.A.,              | : |                                       |
| JOHN DOES 1 through 10,                     | : |                                       |
| Defendants,                                 | : |                                       |
| and   | : |                                       |
| BB NY OPERATIONS 357 <sup>TH</sup> ST., LLC | : |                                       |
|   | : |                                       |
| Nominal Defendant                           | : |                                       |
|   | : |                                       |
|   | : |                                       |
|   | : |                                       |
|   | : |                                       |

---

**NOTICE OF VOLUNTARY DISMISSAL PURSUANT TO F.R.C.P. 41(a)(1)(A)(i)**

Pursuant to F.R.C.P. 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Plaintiff Mprosiemo Limited, and their counsel, hereby give notice that the above-captioned action is voluntarily dismissed without prejudice against the defendants Arkadiy Vaygensberg; Leonid Tatarchu; Stefan Stefanov; Arkensberg, LLC; NIS, Inc.; Romanirov, LLC; Elmwood Ventures,

LLC; Nicholas Barthelemy; George V. Entertainment, S.A.; John Does 1 through 10; and BB NY Operations 357<sup>th</sup> St., LLC.<sup>1</sup>

Date: June 29, 2017

/s/ Ely Goldin  
Ely Goldin, Esq.  
FOX ROTHSCHILD LLP  
100 Park Avenue, Suite 1500  
New York, NY 10017  
Tel: (212) 878-7900  
Fax: (212) 692-0940

*Attorney for Plaintiff Mprosiemo Limited*

---

<sup>1</sup> In particular, Plaintiff's voluntary dismissal is without prejudice to refiling in state court.

**CERTIFICATION**

I hereby certify that on this date, a copy of foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's system.

Date: June 29, 2017

/s/ Ely Goldin  
Ely Goldin, Esq.  
FOX ROTHSCHILD LLP  
100 Park Avenue, Suite 1500  
New York, NY 10017  
Tel: (212) 878-7900  
Fax: (212) 692-0940

*Attorney for Plaintiff Mprosiemo Limited*